



March 26, 2001

David J. Newton Remedial Project Manager US Environmental Protection Agency PO Box 6329 Boston, MA 02114-2023

Re: Request for Information Peterson / Puritan OU#2

Enclosed is Teknor Apex's information request responses for the Peterson/Puritan, Inc. Site, Operable Unit #2, the J. M. Mills Landfill. This response is for the follow up information request submitted to Teknor Apex Company.

Teknor Apex Company is complying with your request to supply additional information. However the requested information is in some cases difficult to find if it exists at all. Attached you will find our responses to most of your follow up questions. This response is incomplete. We are continuing to research specific questions to provide the most thorough answers possible. We are anticipating that we will complete our response within an additional thirty days and we will forward that additional information to you at that time

If you have any questions, please do not hesitate to call me at: 401 - 725 - 8000 ext. 137. Please continue to direct any additional written responses to:

David Yopak
Director of EHS
Teknor Apex Company
505 Central Ave.
Pawtucket, RI 02861-1900

Very truly yours, David J. Jypak

David F. Yopak

Director of Environmental, Health and Safety

CC

Greg Benik (Knight, Holland)

Bill Murray

file

0631-0213

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of

Tekuan Apex Compay and that the foregoing is complete, true, and correct.

Respondent

Executed on MARCH 2002

Signature

Type Name

Title [if any]

Please complete and return this form with your responses to the Information Request

SUPERFUND SITE

1. The answers to the following questions were complied using the recollections of employees who were employed during the periods of time requested. In addition to the employees referred to in the 1999 response those consulted were Jack Brady – Rubber Manager, John McDermott – Rubber Chemist. No records exist showing that Teknor Apex sent any waste to the site in question. These recollections include, that we did use Goditt & Boyer as a waste hauler for an undetermined period of time. Further recollections conclude that Goditt & Boyer was the waste hauler for our main dumpster which would have contained non-hazardous waste such as cardboard, wood, spent containers (bags, boxes or cardboard drums), floor sweepings from Rubber Division only, rubber scrap (burnt batches, cured flashing, rubber chunks) and burnt plastic batches. Goditt & Boyer occasionally supplied Teknor Apex with 50 cubic yard roll-offs which would be used to take away non-hazardous buffing dust from our shoe soling (Solite) and tire re-treading operations.

a.)

- i. John Izzo has passed away. We are unable to further define or explain the meaning of his statements
- ii. Same as i.
- iii. Same as i.
- iv. Same as i.
- v. No records exist indicating Teknor Apex sent any waste to the site.
- vi. Same as v.

b.)

- i. Chemical composition would be: styrene butadienne rubber nitrile butadienne rubber natural rubber.
- ii. Teknor Apex has no information to support the driver's statement that the waste would "ignite easily" or emit an odor.
- iii. No records exist for usage of any 6-yard boxes.
- iv. Same as iii.

c.)

- i. Rubber chunks cured rubber products that would be emitted from the banbury during processing. Chemical Composition would be styrene butadienne rubber nitrile butadienne rubber natural rubber.
- ii. Sweepings from floors of dust generated from normal operation in Rubber Division. Chemical composition would be a wide array of powdered products common to rubber production such as zinc stearate, carbon black, sulfur, accelerators and fillers. Floor sweepings from Plastics and Hose Divisions were reused.
- iii. 55-gallon drums were commonly used to collect floor sweepings from normal operations. See (c ii) for chemical composition.
- iv. Light brown and darker fine powdery dust would be the dust generated from the sanding of shoe soling materials some of which was reused, some of which was sold to be used in the making of bowling balls. Chemical compositions see (c i).

- d.) To the best of our knowledge the "Apex Dust Stop" could refer to the area were the dust collected from sanding tire tread materials and shoe materials (Solite) was stored pending reuse, shipment to vendors or waste disposal. The location of this storage area varied over the years.
- e.)i. The waste did not have a name the containers were marked with the color only.
 - ii. Chemical composition see (c i).
 - iii. Generally black or brown.
 - iv. No appreciable odor other then a characteristic rubber smell.
 - v. The waste generated from the "Apex Dust Stop" was buffing dust that was not hazardous, toxic, flammable, reactive, corrosive or otherwise a hazardous substance.
- f.)
 i. This operation ended in the mid-eighties and no records indicating waste being sent to the Site or volume of waste generated exist.
 - ii. No records exist indicating waste being sent to the Site nor frequencies of disposal.
 - Some of the dust was sold to vendors who reused it in products such as bowling balls. Some of it was reused internally and some of it was taken away by waste haulers but no records exist showing deliver of the waste to the Site.
- g.)
 v. "a lot of rubber waste" could be rubber dust from sanding operations or cured rubber flashings from press operation.
 - vi. Chemical composition would be: styrene butadienne rubber nitrile butadienne rubber natural rubber.
- h.)
 i. The 50-yard box would typically be used to take the dust described in (e. ii to v)
 - ii. The 50-yard compactor would be the primary collection point for non hazardous waste such as cardboard, wood, spent containers (bags, boxes or drums), floor sweepings from Rubber Division only, rubber scrap (burnt batches, cured flashing, and cured rubber chunks) and burnt plastic batches (batches overmixed during processing).
 - iii. No records exist showing disposal to the Site.

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i.)
  i.
          Chemical composition of black dust would be: styrene butadiene rubber -
          nitrile butadienne rubber – natural rubber.
          This term is unknown to Teknor Apex
  ii.
  iii.
          Same as ii.
          Same as ii.
  iv.
          Same as ii.
  V.
          Same as ii.
  vi.
j.)
  i.
           To the best of our knowledge Teknor Apex has never processed any materials
           containing Cyanide. We did dispose of spent bags from a vendor named
           American Cyanimid but it was not Cyanide.
           No way to determine accurately from such a vague description.
  ii.
  iii.
           See (ci).
  iv.
           See (i i).
k.
          50-cubic yard roll-off box would be the container provided by the waste hauler.
  i.
  ii.
          Rubber Dust
          50-cubic yards.
  iii.
  iv.
          Rubber Dust
          As provided for by waste hauler.
  V.
1.
  i.
          30-cubic yard box would be the container provided by the waste hauler
  ii.
          Rubber Dust.
          Rubber Dust
  iii.
          As provided by waste hauler.
  iv.
m.
          Same as (k i).
  i.
  ii.
          Same as (k ii).
  iii.
          Same as (k iv).
          Same as (k v).
  iv.
```

n.

i. Ron Sito – jobs and titles

1968 to 1977	Factory Worker	Plastics Division
1977 to 1985	Supervisor, Manager	Solite Division
1985 to 1990	Manager	Hose Division
1990 to 1995	Manager	E.H.S.
1995 to Present	Director	Human Resources

- ii. Notes attached as Attachment 1.
- iii. Notes attached as Attachment 1.

0.

- i through xxi no records available to determine these numbers during the timeframe in question.
- p. Items i.,xx,xxi. and xxii. Are products not wastes.

Items ii. to vi. are raw materials used in rubber products – small amounts could be Included in floor sweepings disposed of in main dumpster.

Item vii is a raw material that is reused.

Items viii. to xviii. are raw materials used in plastic products scrap amounts are reused. Item xix. is used for cleaning and residual amounts are reused.

q. Incomplete at this time, additional response in thirty days.

r.

- i. no records indicating volume were kept but the spills referred to are minor spills that occurred during normal operations from handling raw materials. These would be in the area of a few ounces to a few gallons.
- ii. no records indicating quantity of Speedi-dri used were kept. Speedi-dri was used only on minor spills of maintenance type fluids. PVC resin would have been used to pick up spills in plastic and hose departments as it could be reused in hose production.
- iii. No records exists from the period to determine where the contents of the dumpster were disposed of nor who the waste haulers were.
- s. No records exist on the volume but:
 - i., ii, iii and ix are raw materials used in rubber, any waste would be minimal.
 - iv. and vi. are raw materials use in plastics, any waste would be reused.
 - v. most would be reused in boilers some would be disposed of as outlined in (u ii)
 - vii, viii and x are raw materials used in rubber products small amounts could be included in floor sweepings disposed of in dumpster.
 - xi. are reused as raw materials in our Garden Hose operations.
- t. Incomplete at this time, additional response in 30 days.

- u.
 - i. burnt rubber batches put in main dumpster in receiving area for removal to landfill by vendors.
 - ii. same as i.
 - iii. Waste oil stored at warehouse for shipment by waste haulers. Records only go back to early eighties indicate the following:

Carrier Site

McDonald & Watson Murphy Waste Oil, Woburn Ma.

East Bay Waste Oil East Bay Waste Oil

McDonald & Watson Narragansett Improvement, Prov. R.I. Sampson Oil Olsen Greenhouses, Raynham, Ma

Oil Recovery Corp. Lionetti Oil Recovery Inc., Old Bridge, N.J.

- iv. unused raw materials same as i.
- v. Miscellaneous solvents stored at warehouse for shipment by waste haulers. Records only go back to early eighties indicate that solvent shipments went to Solvent Recovery Service of New England. These waste solvents were primarily generated from our Soling print operation. It is believed that shipments in 1984 of 25, 80 and 25 drums indicate this material was stored over many years before we disposed of it properly.
- vi. Filter press cake stored at warehouse for reuse internally into Garden Hose operations.

V.

- i. unused raw materials chemical composition would be: carbon black, calcium carbonate, rubber and other unreusables.
- ii. miscellaneous solvents chemical composition would be: MEK, alcohols and various solvent based printing inks.
- w. i. Through viii no records exist to determine volume.
- x. i. through iv and vi through vii would be disposed of in main dumpster outside of Receiving Department for disposal at landfill as determined by waste hauler.
 - v, and viii. would be transported by and delivered to as stated in (u iii).
- y. The Information Request Waste Survey was filled out by Diane Dandeneau who is no longer with the company. No records exist that supports any transfer of this material to the site. This was probably an oversight that this entry was not marked by an asterisk.
- z. No records exist regarding the disposal of asbestos during the time period requested.

aa.

- Lubricants: Petroleum based lubricants, vacuum pump oils, greases, mineral oils, mineral spirits, paraffinic petroleum oils.
 Amounts: Machinery Lubricating Oils: 2000 Gallons (1985)
- ii. Oils: #6 oils, petroleum hydrocarbon oils, soil with #6 oil Amounts: Oil and Soil-Remediation Waste: 200 cubic yds. In 1985, 75 cubic yards in 1986, 6085 gallons #6 oil/sludge/water in 1986
- iii. Laboratory Waste: Approx. 60% Tetrahydrofuran, 30% Methanol, 10% Others: Methylene Chloride, Carbon Tetrachloride, Isopropanol, Chloroform, Acetone, Toluene.

Amount: 360 gallons (1987-1988)

This information comes from MSDS's and Manifest documents for 1985 -1988

bb.

- i. Lubricants: Vacuum truck burned for heating
 Transported by Samson Oil (MAD07569372) to Olson's Greenhouse, 590 South
 Street, Raynham, MA (MAD059733378). Approximately 200-400 gal. every 2
 months 1986.
- ii. Oils: Vacuum Trucks and roll-offs; Vacuum Trucks transported by Clean Harbors of Kingston, MA (MAD039322250), taken to Clean Harbors of Kinston, MA, 100 Joseph St., Kingston, MA (#6 oil/sludge/water), May July 1986.
 Soil with #6 oil transported by MacDonald & Watson (RID093214260) to Narragansett Improvement Co., 223 Allens Ave., Providence, RI,(RID006807911) Manifest stamped "Non-Hazardous in Rhode Island, Accepted for processing at Asphalt Batch Plant". November 1985 and November 1986
- iii. Laboratory Wastes: 55-gallon drums; 4-55 gallon drums in Aug. 1987, 2 in Aug. 1988, transported by Northeast Solvents Corp. (MAD000604447) to Northeast Solvents Corp., 300 Canal Street, Lawrence, MA.
- cc. Explain why the entry for lubricants does not have an asterisk indicating "no documentation supports any transfer of any material to the site".

Unknown. No hardcopy information available. One employee (Robert Berard) does remember Goditt & Boyer picking up waste, but no volumes, destinations or descriptions.

- dd. Incomplete at this time, additional response in thirty days.
- ee. Incomplete at this time, additional response in thirty days.

- ff. Incomplete at this time, additional response in thirty days.
- gg. Incomplete at this time, additional response in thirty days.
- hh. Incomplete at this time, additional response in thirty days.
- ii. Incomplete at this time, additional response in thirty days.
- jj. Incomplete at this time, additional response in thirty days.
- 2 a-c Incomplete at this time, additional response in thirty days.
- 3 a I viii. Incomplete at this time, additional response in thirty days.

Attachment 1.

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APPENDIX B
RESPONSES TO QUESTIONS 4 – 8 FOR
505 CENTRAL AVE.

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JM Mills Site Information Request for the Time Period of 1954 to 1986

Question 4 Compliance with This Request

Name (i)	Current Position (ii)	Job Title during period of investigation (iii)	Job Description	Current or past employee (iv)
Ronald Sito	Personnel Manager	Rubber operator. Hose Dept Manager		
Arthur Laroach	Maintenance Oiler	Plastics Dicer Operator, Bagger Leadman, Mill Leadman	manufactured plastic compounds; oversaw manufacturing process as leadman	Current
John Grimaldi	Maintenance Porter	Rubber Banbury Operator, Mill Operator, Compounder, Leadman	manufactured rubber compounds; oversaw manufacturing process as leadman	Current, retiring on 3/15/99
Edward Lapati	Rubber Production Supervisor	Rubber Banbury Operator, Leadman, Supervisor	manufactured rubber compounds; oversaw manufacturing process as leadman and supervisor	Current
Arthur LaPerche	Retired	Plasticizer Operator, Plasticizer Manager (at Mendon Avenue)	manufactured plasticizer at Mendon Avenue site	Retired

v. Divisions for which records were reviewed: Teknor Apex Company methods

- 1classed to winter Availage of the fourly

vi. The nature of the written documents reviewed are bills of lading, manifest documents, and

The nature of the written documents reviewed are bills of lading, manifest documents, and written notes. These documents date back to 1980. Written records dated 1980 through 1986 were reviewed. These were compiled by Ron Sito of Teknor Apex (former Safety and Environmental Manager - refer to section 7).

vii. These records were kept in Environmental Manager's Office.

viii. These records are currently kept in the Environmental Manager's Office.

was whij

Generation of Waste During Time of Disposal Question 5

Teknor Apex Company a) 505 Central Avenue Pawtircket, RI 02861

Process

Teknor Apex Company 90 Mendon Road Pawtucket, RI 02861

Company oad
02861

following to fine to force of the forc

Process	Commenced	Ceased	Location
Rubber Compounding (Tread Rubber)	1954 1/1	1993	505 Central Ave.
Rubber Compounding & Molding (Blocks)	1954 64	present operation	505 Central Ave.
Rubber Molding (Mats)	1977	present operation	505 Central Ave.
Rubber Compounding (Solite - shoe soling)	1954	1984	505 Central Ave.
Plastics Compounding (PVC)	1957 14	present operation	505 Central Ave.
Garden Hose Manufacturing	1954 64	1992	505 Central Ave.
Telcar (sheet rubber) Molding	1980	present operation	505 Central Ave.
Manufacturing of chemical additives for plastics compounds	1952 64	1965	90 Mendon Rd.
_Wire Coating Material Manufacturing	1965	1970	90 Mendon Rd

c)

1	Rubber Compounding (Tread Rubber)	Production moved to Tennesse plant in 1993.
	Rubber Compounding & Molding	Production increased in these areas with the deletion
-	(Blocks/ Mats)	of other products.
	Rubber Compounding (Solite – shoe soling)	Production ceased in (1984)
	Plastics Compounding (PVC)	3 production lines through 1960, 4 lines through 1962, 5 lines through 1980, 6 lines through 1986 with the addition of a line which manufactured nontoxic, medical grade PVC
	Garden Hose Manufacturing	Production moved to Tennesse plant in 1993. 94
	Telear (sliget rubber) Moldarig (TPE)	Began in Plastics department; changed to Rubber

Changes in operation

department in 1984.

Production moved to Massachusetts plant.

Production ceased in 1970---

-esamille-1759 Suil Will-

Manufacturing chemical additives for

-Wire Coating Material Manufacturing

plastics compounds

PETERSON PURITAN
OPERATING UNIT 2
SITE FILE

CONFIDENTIAL INFORMATION REDACTED.

[SEE CONFIDENTIAL FILE(S) FOR ADDITIONAL INFORMATION]

Note: This is a silo sheet. Please do not apply document number labels to this sneet.

Burnt PVC Batches	none	Plastic Department	dumpster in
	· 		Receiving
			Department
Waste oil	: drum	each aepartment	Warehouse at
		† †	Mendon Ave
Unused raw materials	various - bags, metal	each department	dumpster in
	drums, cardboard		Receiving
	drums	!	Department
Miscellaneous Solvents	drums	Rubber Department	drams stored at
		Mendon Avenue	Mendon Avenue
Filter Press Cake	metal drums	Mendon Avenue	Mendon Avenue

7

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<u>Ouestion 7</u> Respondents Disposal/Treatment/Storage/Recycling/Sale of Waste

Identify persons who currently have and those who have been responsible for disposal of waste

Name	Business Address &	Home Address &	Employer & Job	SS#
	Phone Number	Phone Number	Title	(Optional)
Diane	505 Central Avenue		Teknor Apex	
Dandeneau	Pawtucket, RI		Company.	
	02861		Environmental	
	(401) 725-8000x780		Manager	
Ronald Sito	505 Central Avenue		Teknor Apex	
j	Pawtucket, RI		Company,	
L	02861		Safety and	
ľ	(401) 725-8000x281		Environmental	
	ļ		Manager	

b) There are many persons who currently have and/or have had knowledge of the disposal of waste.

Those questioned for this information request are listed below:

Name	Business Address & Phone Number	Home Address & Phone Number	Employer & Job Title	SS# (Optional)
Arthur Laroache	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000		Teknor Apex Company. Maintenance Oiler	
John Grimaldi	505 Central Avenue Pawtucket, RI 02861 (401) 725-8000		Teknor Apex Company. Maintenance Porter	
Arthur LaPerche	Retired		Teknor Apex Company. Plasticizer Production Manager (1952- 1970)	

Tho

Child County

P. C. C. C.

c) Persons currently having and those who have had responsibility for Environmental Affairs

Name	Business Address &	i	Employer & Job	SS#
	Phone Number	Phone Number	Title	(Optional)
Diane	505 Central Avenue		Teknor Apex	
Dandeneau	Pawtucket, RI	4 22	Company.	
	02861		Environmental	
	(401) 725-8000x ⁷ 80		Manager.	
			10/97 - present	i
Laura Salamy	Precision Art and			
(former	Pac Glass, Inc			j
employee)	22 Almeida Ave.			
	East Providence, RI			
	02914		r i	
	(401) 438-9800			
Tim Coady			1	
(former				
employeer				
Ronald Sito	505 Central Avenue		Teknor Apex	1
	Pawtucket, RI		Company.	1
	02861	!	Safety and	1
	(401) 725-8000x281		Environmental	1
	İ		Manager, 1990-	i
			1995	

John Meo-LA?

d)

Name	Job Title with dates	Supervisor	Current Position	What type of information is possesed?
Diane Dandeneau	Environmental Manager	Christopher ReCasino	same	overall plant environmental
Ronald Sito	Rubber operator. Hose Dept Manager. Safety and Environmental Manager (1990-1995). Personnel Manager (1995-present)	Paul Dubanowitz Christopher ReCasino	Personnel Manager	knowlege (present) general plant production and environmental knowldege (1968 - present)
Arthur Laroach	Plastics Dicer Operator. Bagger Leadman. Mill Leadman. Med Line Operator. Maintenance Oiler	Donald Brown	Maintenance Oiler	PVC manufacturing and maintenance experience (1962 - present)
John Grimaldi	Rubber Banbury Operator, Mill Operator, Compounder,		Maintenance Porter	Rubber manufacturing and maintenance experience (1963 - present)

		Leadman, Maintenance Porter	Mark Eddelston		
	Arthur LePerche	Plasticizer Operator, Plasticizer Manager Manager		Retired	Knowledge of Plasticizer production at Mendon Avenue from 1952-1970.
` `		J	<u> </u>	I	

e)

Waste Name	Type of Container Stored in	Description of Container	Used Container Prior Use
Burnt Rubber Batches	none	not applicable	not applicable
Burnt PVC Batches	none	not applicable	not applicable
Waste oil	drum	metal drums, most likely black	waste oil
Unused raw materials	various - bags, metal drums, cardboard drums	used cardboard drums were typically blue	Pigment raw materials
Filter Press Cake	metal drums	metal drums, most likely black	unknown

* 72
Records date back to 1980 only. Therefore, information contained below is based on records from 1980 - 1986.

Waste Name	Where Disposed of (r & h)	Who Carried it (i.j.k)	What was the Frequency of Shipment (I)	What was the Volume of Shipments (m)	Dates from and to material was shipped (n)
Waste Oil (manifested)	a) Murphy Waste Oil Woburn, MA b) Narragansett Improv. Co, Providence,RI	McDonald & Watson	Twice per year from 1980 - 1985		
Waste Oil (manifested)		East Bay Waste Oil	Once in 1986		
Waste Oil (manifested)	Olsen Greenhouses Raynham, MA	Sampson Oil	once in 1986	1800	11/13/86
Waste Oil (manifested)	Lionetti Oil Recovery, Inc. Old Bridge, NJ	Oil Recovery Corporation	once in 1986	1800	12/12/86
Waste Solvents	Solvent Recovery Service of New England	same	Three times in 1984	25,80, and 24 drums MEK, alcohols, misc	3/84, 6/84, 6/84

* 77 respont.

		solvents	

- o) Copies of Manifests or Bills of Lading see attached.
- p) No knowledge of types of vehicles used.
- q) No knowledge of carrier's employees except for names on manifest documents from 1980 to 1986
- r) Listed in table in section f. Ultimate disposal assumed to be same location.
- s) Listed in table in section f. Ultimate disposal assumed to be same location.
- t) Information on how TA managed waste pickups is unknown.
- u) Information unknown.
- v) Information unknown.
- w) This information is unknown. Dry material may have been washed into drains which ultimately flowed into the POTW.
- x) The Blackstone Valley District Commission 102 Campbell Avenue East Providence, RI 02916

at present:

The Narragansett Bay Commission

235 Promenade Street Providence, RI 02908

y) See Waste Survey.

No documentation supports transfer of material to "The Sate"

> bold

Question 8 - Respondent's Environmental Reporting

a) Central Avenue:

RID045367968

Mendon Avenue:

RID987480357

- b) None
- c) Not applicable
- d) Rhode Island Department of Environmental Management Division of Air and Hazardous Materials Room 204 Cannon Building Providence, RI 02908

Rhode Island Department of Environmental Management Division of Air and Hazardous Materials 75 Davis Street Providence, RI 02908

Rhode Island Department of Environmental Management Division of Waste Management 291 Promenade Street Providence, RI 02908

- e) 1985-present
- f) 1) Emergency Planning and Community Right to Know Act, 42 U.S.C.1101 (EPCRA)
 - 2) SARA Section 313 Title III Form R Reporting
 - 3) RI Air Pollution Control Regulations
 - 4) Resource Conservation and Recovery Act. Title 40 CFR Parts 260 279
 - 5) RI Rules and Regulations for Hazardous Waste Management
 - 6) Rules and Regulations for The Use Of The Wastewater Facilities Within The Narragansett Bay Water Quality Management District
 - 7) SARA Title III. Section 312. Tier II
- g) EPCRA Reporting Center PO Box 3348 Merrifield, VA 22116

RI Department of Environmental Management Division of Air Resources 235 Promenade Street Providence, RI 02908

The Narragansett Bay Commission 235 Promenade Street Providence, RI 20908

State Emergency Response Commission c/o Department of Labor and Training Division of Occupational Safety 610 Manton Avenue Providence, RI 02909 City of Pawtucket Fire Prevention Office 155 Roosevelt Avenue Pawtucket, RI 02760

LEPC District 4
Pawtucket Fire Department
145 Roosevelt Avenue
Pawtucket, RI 02760
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TEKNOR APEX COMPANY

PAWTUCKET, RHODE ISLAND 02861-1900

RETURN RECEIPT REQUESTED

David J. Newton
Remedial Project Manager
US Environmental Protection Agency
PO Box 6329
Boston, MA 02114-2023